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Issue: 21, 10, 28, 5, 9, 32  
Duplicate letter

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## MARYLAND RURAL HEALTH ASSOCIATION

April 22, 2008

Health Resources and Services Administration,  
Department of Health and Human Services  
Attn: Ms. Andy Jordan  
8C-26 Parklawn Bldg.  
5600 Fishers Lane  
Rockville, MD 20857

Western Maryland AHEC  
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Cumberland, MD 21502  
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Dear Ms. Jordan,

On behalf of the Maryland Rural Health Association (MRHA) I am writing to offer the following comments and suggestions regarding the Proposed Rulemaking 42CFR Part 5 and 51c: Designation of Medically Underserved Populations and Health Professional Shortage Areas. The MRHA serves all of rural Maryland which continues to enjoy substantial rural areas and population. The State, in its rural areas, also displays significant health disparities and issues associated with access and service. I am concerned with the potential impact of the new rules and how they would impact health care within the State. However, lack of information prevents me at this time from making any conclusion on this impact. My specific concerns are as follows:

- lack of information regarding the impact on funding and eligibility for funding that would result from the new rule, 10 ✓
- lack of data for designating population groups and sub-county areas, 28 ✓
- an independent weighting of the score in favor of less densely populated areas, 5 ✓
- the increased data collection burden, and 9 ✓
- Inconsistent data values provided by HRSA for impact testing. 32 ✓

As a result, I request a postponement of the comment period until these issues are addressed and I further request that HRSA allow ample time to analyze the proposed rules impact. 21 ✓

I appreciate the opportunity of sharing with you my concerns.

Thank you,

Jacob F. Frego

President- Maryland Rural Health Association